



THE CITY OF NEW YORK
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January 6, 2021

BY ECF

Honorable James L. Cott
United States Magistrate Judge
Southern District of New York
United States Courthouse
500 Pearl Street
New York, NY 10007

Re: Alexander Williams v. City of New York, et al.,
19 Civ. 3347 (LJL) (JLC)¹

Your Honor:

I am a Senior Counsel in the office of James E. Johnson, Corporation Counsel of the City of New York, and one of the attorneys for Defendants in the above-referenced action. Defendants respectfully request a 1-day extension of the discovery deadline, from January 11, 2021, up to and including January 12, 2021, for the limited purposes of conducting plaintiff's deposition in light of George R. Vierno Center's ("GRVC") inability to produce plaintiff on January 8, 2021. This is defendants' fifth request for an extension of the discovery deadline and there are no scheduled conferences that will be affected by this proposed extension. To the extent that Your Honor is inclined to grant defendants' request, defendants also request that the Court endorse the attached Order directing the Warden or other official in charge of GRVC to produce plaintiff for his deposition on January 11, 2021, from 3:30 p.m. to 6:30 p.m. and on January 12, 2021, from 3:00 p.m. to 7:00 p.m.

Today, defendants were informed by George R. Vierno Center ("GRVC") that it cannot produce plaintiff for the deposition scheduled for January 8, 2021. The only dates and times that GRVC can provide for a seven hour deposition is on January 11, 2021, from 3:30 p.m. to 6:30 p.m. and on January 12, 2021, from 3:00 p.m. to 7:00 p.m.

¹ This matter was originally docketed as 20-cv-3992. However, on or about August 27, 2020, this matter was consolidated into the matter bearing docket number 19-cv-3347.

Accordingly, defendants respectfully request a 1-day extension of the discovery deadline, from January 11, 2021 up to and including January 12, 2021, for the limited purposes of conducting plaintiff's deposition, and that Your Honor endorse the attached Order providing for the production of plaintiff for deposition. Thank you for your consideration of this matter.

Sincerely,

Qiana Smith-Williams

Qiana Smith-Williams²

Senior Counsel

cc: **VIA FIRST-CLASS MAIL**

Alexander Williams
George R. Vierno Center
09-09 Hazen Street
Bronx, NY 11370

² This case has been assigned to Assistant Corporation Counsel Aaron Davison, who passed the New York State Bar Exam and is presently applying for admission. Mr. Davison is handling this matter under supervision and may be reached at (646) 988-3220 or adavison@law.nyc.gov.